

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LABORERS' PENSION FUND and)
LABORERS' WELFARE FUND OF THE)
HEALTH AND WELFARE DEPARTMENT)
OF THE CONSTRUCTION AND GENERAL)
LABORERS' DISTRICT COUNCIL OF)
CHICAGO AND VICINITY, JAMES S.)
JORGENSEN,)
Plaintiffs,) Case No. 08 C763
v.)
DIXON INTERIORS, INC.,) Judge Gettlemen
Defendant.)

AFFIDAVIT OF KAREN I. ENGELHARDT

STATE OF ILLINOIS)
)
COUNTY OF COOK)

Karen I. Engelhardt being first duly sworn on oath, deposes and states as follows:

1. I am an attorney and a shareholder at the law firm of Allison, Slutsky & Kennedy, P.C., counsel for plaintiffs Laborers' Pension Fund and Laborers' Welfare Fund of the Health and Welfare Department of the Construction and General Laborers' District Council of Chicago and Vicinity (the "Laborers' Funds") in the action against Dixon Interiors, Inc. This affidavit is submitted to document attorneys' fees and costs incurred by the Laborers' Funds for work performed in connection with obtaining contributions owed for the period from December 14, 2007 to the present.

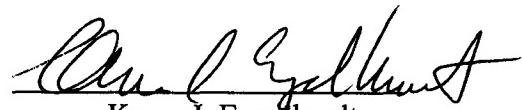
2. This firm bills the Laborers' Funds on an hourly basis for services rendered to the Funds, at a rate of \$175.00 per hour for shareholders, \$150.00 per hour for associates, and \$75.00

per hour for clerks/paralegals. In this cause, records for legal work on this matter were kept contemporaneously and are attached hereto as Exhibit 1.

3. Exhibit 1 hereto sets forth the time expended from December 14, 2007 through April 14, 2008, by the firm's attorneys and paralegals in this matter. Counsel includes time preparing this affidavit and computing all amounts owed in the proposed judgment order on April 15, 2008. As set forth in that Exhibit, the Laborers' Funds have incurred legal fees to my firm in this matter in the amount of \$1,195.00.

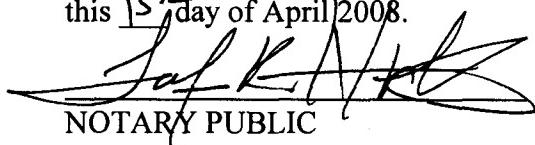
4. In addition, the Laborers' Funds have incurred the following costs in the prosecution of this matter totaling \$410.00, which include filing and service fees.

FURTHER AFFIANT SAYETH NOT.

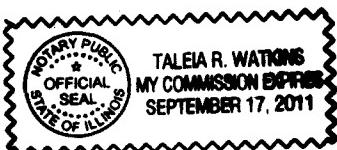


Karen I. Engelhardt

Subscribed and sworn to before me
this 15th day of April 2008.



NOTARY PUBLIC



4/15/2008
3:59 PMAllison, Slutsky & Kennedy, P.C.
Slip Listing

Page 1

Selection Criteria

Slip.Classification Open
 Clie.Selection Include: Labrs P&W 1
 Refe.Selection Include: Dixon Interiors
 Slip.Date 12/14/2007 - 4/15/2008

Rate Info - identifies rate source and level

Slip ID	Dates and Time	Posting Status	Description	Attorney	Units	Rate	Slip Value
				Activity	DNB Time	Rate Info	
				Client Reference	Est. Time	Bill Status	
146796	TIME 12/14/2007	G:14578	1/18/2008 Call w/B. Mortimer	Josiah Groff Legal Services Labrs P&W 1 Dixon Interiors	0.10 0.00 0.00 0.00	150.00 C@2	15.00
146803	TIME 12/17/2007	G:14578	1/18/2008 Conf. w/KIE re reports needed; letter to B. Mortimer; conf. w/KIE re case status	Josiah Groff Legal Services Labrs P&W 1 Dixon Interiors	0.50 0.00 0.00 0.00	150.00 C@2	75.00
147104	TIME 1/3/2008	G:14596	2/14/2008 Call w/ B. Mortimer	K. Engelhardt Legal Services Labrs P&W 1 Dixon Interiors	0.10 0.00 0.00 0.00	175.00 C@1	17.50
147118	TIME 1/4/2008	G:14596	2/14/2008 Calls w/ B. Mortimer, M. Christopher	K. Engelhardt Legal Services Labrs P&W 1 Dixon Interiors	0.40 0.00 0.00 0.00	175.00 C@1	70.00
147216	TIME 1/7/2008	G:14596	2/14/2008 Calls w/ M. Christopher, B. Mortimer	K. Engelhardt Legal Services Labrs P&W 1 Dixon Interiors	0.30 0.00 0.00 0.00	175.00 C@1	52.50
147653	TIME 1/9/2008	G:14596	2/14/2008 Call w/ M. Christopher	K. Engelhardt Legal Services Labrs P&W 1 Dixon Interiors	0.10 0.00 0.00 0.00	175.00 C@1	17.50
147805	TIME 1/21/2008	G:14596	2/14/2008 Calls to B. Mortimer, M. Christopher	K. Engelhardt Legal Services Labrs P&W 1 Dixon Interiors	0.20 0.00 0.00 0.00	175.00 C@1	35.00
147939	TIME 1/22/2008	G:14596	2/14/2008 Call w/ W. Mortimer	K. Engelhardt Legal Services Labrs P&W 1 Dixon Interiors	0.10 0.00 0.00 0.00	175.00 C@1	17.50

4/15/2008
3:59 PMAllison, Slutsky & Kennedy, P.C.
Slip Listing

Page 2

Slip ID		Attorney	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
147946	TIME	K. Engelhardt	0.20	175.00	35.00
1/23/2008		Legal Services	0.00	C@1	
Billed	G:14596	2/14/2008	Labrs P&W 1	0.00	
Call w/ B. Mortimer		Dixon Interiors	0.00		
148048	TIME	Wes Kennedy	0.10	175.00	17.50
1/26/2008		Legal Services	0.00	C@1	
Billed	G:14596	2/14/2008	Labrs P&W 1	0.00	
Work on status reports		Dixon Interiors	0.00		
148092	TIME	K. Engelhardt	0.10	175.00	17.50
1/27/2008		Legal Services	0.00	C@1	
Billed	G:14596	2/14/2008	Labrs P&W 1	0.00	
Report to Trustees		Dixon Interiors	0.00		
148113	TIME	K. Engelhardt	0.00	175.00	0.00
1/27/2008		Legal Services	0.00	C@1	
Billed	G:14596	2/14/2008	Labrs P&W 1	0.00	
work on charts		Dixon Interiors	0.00		
148197	TIME	Wes Kennedy	0.10	175.00	17.50
1/28/2008		Legal Services	0.00	C@1	
Billed	G:14596	2/14/2008	Labrs P&W 1	0.00	
Work on status reports		Dixon Interiors	0.00		
149063	TIME	K. Engelhardt	0.60	175.00	105.00
2/4/2008		Legal Services	0.00	C@1	
Billed	G:14618	3/6/2008	Labrs P&W 1	0.00	
Call w/ M. Christopher; draft complaint		Dixon Interiors	0.00		
149747	TIME	Andre Smith	1.00	75.00	75.00
2/4/2008		Legal Services	0.00	C@3	
Billed	G:14618	3/6/2008	Labrs P&W 1	0.00	
Prepare case: summons, appearance, civil cover sheet and exhibit labels		Dixon Interiors	0.00		
149750	TIME	Andre Smith	0.50	75.00	37.50
2/14/2008		Legal Services	0.00	C@3	
Billed	G:14618	3/6/2008	Labrs P&W 1	0.00	
Draft letter and prepare for service		Dixon Interiors	0.00		
149827	TIME	K. Engelhardt	0.20	175.00	35.00
2/25/2008		Legal Services	0.00	C@1	
Billed	G:14618	3/6/2008	Labrs P&W 1	0.00	
Call w/ M. Christopher; review service of summons		Dixon Interiors	0.00		
150767	TIME	Josiah Greff	0.10	150.00	15.00
3/4/2008		Legal Services	0.00	C@2	
Billed	G:14643	4/11/2008	Labrs P&W 1	0.00	
Efiling summons and return		Dixon Interiors	0.00		

4/15/2008
3:59 PMAllison, Slutsky & Kennedy, P.C.
Slip Listing

Page 2

Slip ID			Attorney	Units	Rate	Slip Value
Dates and Time			Activity	DNB Time	Rate Info	
Posting Status			Client	Est. Time	Bill Status	
Description			Reference	Variance		
150672	TIME		K. Engelhardt	0.10	175.00	17.50
3/5/2008			Legal Services	0.00	C@1	
Billed	G:14643	4/11/2008	Labrs P&W 1	0.00		
Call w/ M. Christopher			Dixon Interiors	0.00		
150916	TIME		K. Engelhardt	0.30	175.00	52.50
3/14/2008			Legal Services	0.00	C@1	
Billed	G:14643	4/11/2008	Labrs P&W 1	0.00		
Letter to W. Mortimer			Dixon Interiors	0.00		
151294	TIME		K. Engelhardt	0.10	175.00	17.50
3/25/2008			Legal Services	0.00	C@1	
Billed	G:14643	4/11/2008	Labrs P&W 1	0.00		
Call w/ W. Mortimer			Dixon Interiors	0.00		
152086	TIME		K. Engelhardt	1.20	175.00	210.00
4/7/2008			Legal Services	0.00	C@1	
WIP			Labrs P&W 1	0.00		
Draft M. Christopher affidavit; call w/ M. Christopher, work on motion, letter to M. Christopher			Dixon Interiors	0.00		
152357	TIME		K. Engelhardt	1.00	175.00	175.00
4/11/2008			Legal Services	0.00	C@1	
WIP			Labrs P&W 1	0.00		
Complete motion, draft order, notice of motion; letter to M. Christopher			Dixon Interiors	0.00		
152366	TIME		K. Engelhardt	0.10	175.00	17.50
4/14/2008			Legal Services	0.00	C@1	
WIP			Labrs P&W 1	0.00		
Call w/ M. Christopher			Dixon Interiors	0.00		
<hr/>				<hr/>	<hr/>	<hr/>
Grand Total				<hr/>	<hr/>	<hr/>
				Billable	7.50	1145.00
				Unbillable	0.00	0.00
				Total	7.50	1145.00
<hr/>				<hr/>	<hr/>	<hr/>

— 125.00

\$ 1,020.00

+ 4/15/08

175.00

Total 1,195.00